

FILED 04 FEB 2013 19 USDC ORP

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

UNITED STATES OF AMERICA

3:20-cr- 28-MO

v.

INFORMATION

GINA R. CHILES,

18 U.S.C. § 1343

Defendant.

THE UNITED STATES ATTORNEY ALLEGES:

COUNT 1
(Wire Fraud)
(18 U.S.C. § 1343)

1. GINA R. CHILES, defendant herein, owned and operated a property management business for commercial properties in the District of Oregon called Inspire Vision Property Management, LLC (Inspire Vision).

2. From 2014 through 2018, defendant GINA R. CHILES devised and intended to devise a material scheme to defraud clients of Inspire Vision and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises.

3. As part of the services offered by Inspire Vision, defendant's clients deposited funds in bank accounts to which defendant had access to and control. Defendant promised clients that she would use those funds to pay bills, oversee repairs and renovations to specific properties, and for costs associated solely with the management of commercial property. Instead, defendant

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diverted those client funds, deposited the funds into bank accounts owned and controlled by her and used the funds for her own personal use. Over the course of defendant's scheme, she diverted more than \$1 million in client funds.

4. On or about May 4, 2018, for the purpose of executing the scheme to defraud described above, and attempting to do so, defendant caused to be transmitted by means of wire communication, in interstate commerce, a money wire as follows:

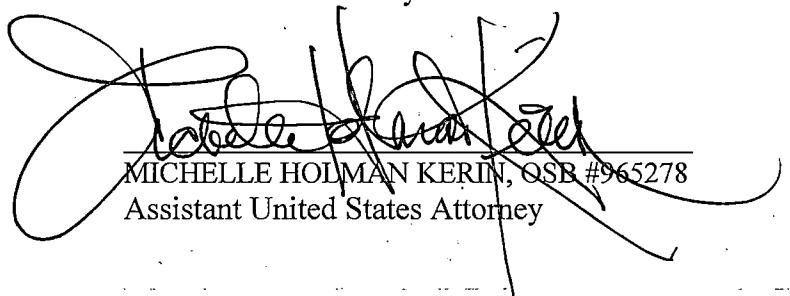
Description of wire	From	To
\$50,080.00	Harrison Court - Key Bank ***4572 (Oregon)	IVPM - Key Bank ****4465 (Washington)

All in violation of Title 18, United States Code, Section 1343.

Dated: February 4, 2020

Respectfully submitted,

BILLY J. WILLIAMS
United States Attorney



MICHELLE HOLMAN KERIN, QSB #965278
Assistant United States Attorney